

STATE OF MINNESOTA
COUNTY OF ST. LOUIS

DISTRICT COURT
SIXTH JUDICIAL DISTRICT

Case File No.:

Robert E. Mathias,

Plaintiff,

vs.

SUMMONS

Susan Hettich,

Defendant.

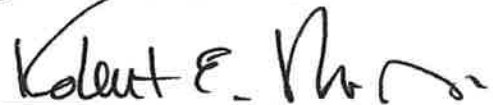
THE STATE OF MINNESOTA TO THE ABOVE-NAMED DEFENDANT:

You are hereby summoned and required to serve upon the Plaintiff's attorney and Answer to the Complaint which is herewith served upon you within twenty (20) days after service of this Summons and Complaint upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

The case may be subject to Alternative Dispute Resolution (ADR) process under Rule 114 of the General Rules of Practice for the District Courts. The Court Administrator or your attorney can provide you with the information about ADR options and a list of neutrals available in your area. ADR does not affect your obligation to respond to the Summons and complaint within twenty (20) days.

Dated this 19th day of March, 2020.

MATHIAS LAW FIRM



Robert E. Mathias - #68561
Attorney for Plaintiff
11 E. Superior St., Suite 506
(218) 625-8480

STATE OF MINNESOTA
COUNTY OF ST. LOUIS

DISTRICT COURT
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Robert E. Mathias,

Case File No.:

Plaintiff,

vs.

COMPLAINT

Susan Hettich,

Defendant.

Comes now the Plaintiff and for his causes of action against Defendant states and alleges as follows:

1. Plaintiff is a resident of Duluth, Minnesota and Defendant is a resident of W. Fargo, North Dakota.
2. Plaintiff is an Attorney licensed to practice law in the State of Minnesota.
3. Sometime prior to August 31, 2018 Defendant illegally obtained Plaintiff's confidential tax records and converted those records to her own use.
4. On August 31, 2018, Defendant maliciously filed a Complaint with the Minnesota Office of Lawyers Professional Responsibility alleging the following:
 - A: That plaintiff was guilty of an undefined misconduct that brought into question Plaintiff's honesty.
 - B: That Plaintiff's undefined misconduct was prejudicial to the administration of justice.
 - C: That Plaintiff had violated in some undefined manner the terms of an installment payment agreement he had with the IRS.
 - D: That Plaintiff's undefined conduct had affected his integrity as an attorney.
 - E: That Plaintiff's undefined conduct had affected his clients.

F: That Plaintiff's undefined conduct had affected other members of the bar.

G: That Plaintiff's undefined conduct had lessened the public's perception of attorneys.

H: That Plaintiff's undefined dishonest conduct was continuing and placed his clients and the justice system at the great risk of being victimized by Plaintiff.

5. Defendant converted some of Plaintiff's tax documents and used said documents as proof of her allegations.
6. The tax documents had been in the exclusive custody and control of Plaintiff's former tax accountant and had been taken from the tax accountant's records by Defendant who gained access to said files after Plaintiff's former Tax accountant passed away.
7. All of Defendant's allegations of misconduct are false and were generated and used by Defendant in an attempt to remove Plaintiff as the Attorney for his four grandchildren who at the time were engaged in a legal proceeding with a Trust that had as one of its Trustees, the Defendant.
8. Defendants false allegations of dishonest and disreputable conduct have no basis in fact and Defendant had no knowledge of the truth or falsity of any of the allegations she made to the Minnesota Office of Lawyers Professional Responsibility.
9. Defendant's false allegations were made maliciously and for the sole purpose of removing Plaintiff, as an attorney, in a contested matter and for the purpose of destroying Plaintiff's reputation as an attorney.
10. Defendant's false written allegations were maliciously made to damage Plaintiff's livelihood as an Attorney and as such make Defendant guilty of Defamation Per Se.
11. Defendant's use of Plaintiff's tax documents without his knowledge or permission makes Defendant liable for conversion under Minnesota Law.

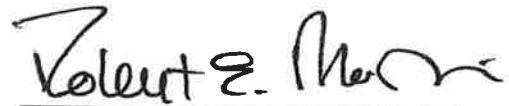
Wherefore Plaintiff demands Judgement against Defendant in an amount in excess of \$50,000 plus costs and disbursements incurred herein plus other damages that may be allowable under Minnesota Law.

ACKNOWLEDGEMENT

The undersigned acknowledges that pursuant to M.S.A. 549.211, costs, disbursements, reasonable attorney's fees and/or sanctions may be awarded to the party against whom the allegations herein are asserted

MATHIAS LAW FIRM

Dated this 19th day of March, 2018.



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